



November 1, 2010

Reply to the Attn: Office of Chief Counsel

MEMORANDUM FOR RECORD

FROM: Attorney Advisor

SUBJECT: Approval for SSC Employees with Senior Institutional or Project Responsibilities to Attend a Reception Sponsored by URS Corporation

In accordance with 5 C.F.R. 2635.204(g)(2) and (3), I make the following determination:

Stennis Space Center ("SSC") employees with senior institutional or project responsibilities have been invited to attend a reception being sponsored by URS Corporation ("URS") at The National World War II Museum in New Orleans, Louisiana on Monday, November 15, 2010, from 6:30 p.m. to 9:00 p.m.


This event will be a widely-attended gathering of approximately 175 individuals, including Government, civic, business and academic leaders from the surrounding community. The estimated cost of the reception is \$50 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in NASA personnel attending this event, as it will place them in a diverse forum conducive to disseminating information on NASA's ongoing and future activities and discussing matters of interest to NASA. Additionally, the attendance of NASA employees at the event will help to raise NASA's profile with national, state, and local business and governmental leaders and will contribute to community relations.

URS is a NASA contractor currently involved in various facility operations contracts with the Agency, including an IDIQ contract at SSC. Some SSC personnel invited to attend this event presently hold positions that could substantially affect matters related to URS's business interests. The invited personnel include the following: SSC Center Director; SSC Deputy Director; SSC Associate Director; and the SSC Director of Project Directorate. I have determined that the value to the agency in having these senior institutional and project leaders attend this event outweighs any concern that free attendance may or may appear to improperly influence them in the performance of their duties.

Accordingly, SSC employees in the positions identified above may accept free attendance at the event. Other NASA employees invited to this event who hold positions that are unlikely to substantially affect matters related to URS's business interests, may also attend the event pursuant to this determination. Attendees may accept invitations for accompanying spouses or guests. All attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635. 204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion and no more than \$50 from one source in a calendar year. NASA invitees should not accept any gift items distributed at the reception exceeding those caps.

URS is a lobbying organization and, as such, NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of the refreshments they and any accompanying guests consume at the reception.

Questions about this determination may be addressed to me at 228-688-2164.

A handwritten signature in black ink, appearing to read 'Wendy L. Houser', is written over a horizontal line.

Wendy L. Houser